



U.S. Department of Energy
Office of River Protection

**P.O. Box 450
Richland, Washington 99352**

02-OSR-0608

Mr. R. F. Naventi, Project Manager
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – APPROVAL OF BECHTEL NATIONAL, INC. (BNI)
AUTHORIZATION BASIS CHANGE NOTICE (ABCN) 24590-WTP-ABCN-ESH-02-028, REV. 0

Reference: BNI letter from R. F. Naventi to R. J. Schepens, ORP, "For Approval: Authorization Basis Change Notice 24590-WTP-ABCN-EST-02-028, Rev. 0, Change 'Implementing Codes and Standards' from ASME AG-1-1997 to ASME AG-1-1007, with ASME AG-1A 2000 Addenda," CCN 035828, dated December 4, 2002.

This letter approves ABCN 24590-WTP-ABCN-ESH-02-028, Revision 0, provided in the Reference. This ABCN proposes changes to the Safety Requirements Document (SRD) Implementing Codes and Standards for Safety Criterion 4.4-6, 4.4-7, 4.4-8, 5.3-4 and 5.3-5. It is proposed that the Implementing Codes and Standards be revised to reference "ASME AG-1-1997 with ASME AG-1a 2000 Addenda" instead of ASME AG-1-1997.

The proposed change does not adversely affect the release of radiological or chemical materials. It also does not affect any surveillance or maintenance requirements for the filter housings and is administrative in that it consolidates all filter housing construction and testing requirements into one code. Based upon the information in the Reference and the attached Safety Evaluation Report (SER), the U.S. Department of Energy, Office of River Protection (ORP) found the proposed changes identified in the above ABCN acceptable. The ORP concluded that there is reasonable assurance that the health and safety of the public, the workers, and the environment will not be adversely affected and they comply with applicable laws, regulations, and River Protection Project Waste Treatment and Immobilization Plant contractual requirements. Attached is the ORP's SER for the proposed changes.

As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the SRD, identifying all revisions to date. This amendment is effective immediately and shall be fully implemented within 30 days; i.e., the provisions of the amendment may be used immediately; within 30 days, controlled copies of the SRD and subordinate documents must be modified to reflect the changes associated with this amendment.

Mr. R. F. Naventi
02-OSR-0608

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If you have any questions, please contact me, or your staff may contact Walter J. Pasciak, WTP Safety Regulation Division, (509) 373-9189.

Sincerely,

OSR:WJP

Roy J. Schepens
Manager

Attachment

**Safety Evaluation Report (SER)
of Proposed Authorization Basis Change Notice (ABCN)
ABCN-24590-02-028, Rev. 0
to the Safety Requirements Document (SRD)
for the River Protection Project Waste Treatment and Immobilization Plant (WTP)**

1.0 INTRODUCTION

The WTP authorization basis is the composite of information provided by a Contractor in response to radiological, nuclear, and process safety requirements that is the basis on which the U.S. Department of Energy, Office of River Protection (ORP) grants permission to perform regulated activities. The authorization basis for the WTP includes the SRD and the Integrated Safety Management Plan (ISMP). The SRD contains the approved set of radiological, nuclear and process safety standards and requirements which, if implemented, provide adequate protection of workers, the public, and the environment against the hazards associated with the operation of the facility. The ISMP defines a set of integrated activities that is directed toward the management or control of radiological, nuclear, and process hazards such that adequate protection is provided to workers, the public, and the environment. By letter dated December 4, 2002¹, Bechtel National, Inc. (the Contractor), submitted a proposed amendment to the SRD for Implementing Codes and Standards covering the design, construction and testing of nuclear facility filter housings. This SER documents the ORP evaluation of the changes proposed by the Contractor.

The amendment proposes changes to the SRD Implementing Codes and Standards for Safety Criterion 4.4-6, 4.4-7, 4.4-8, 5.3-4 and 5.3-5. It is proposed that the Implementing Codes and Standards be revised to reference “ASME AG-1-1997 with ASME AG-1a 2000 Addenda” instead of ASME AG-1-1997.

2.0 BACKGROUND

ASME AG-1-1997, “Code on Nuclear Air and Gas Treatment,” is currently being used as the principal reference source for HVAC Structures, systems, and components (SSCs) involved with nuclear air and gas treatment. In addition, parts of ASME N509-89, “Nuclear Power Plant Air Cleaning Units and Components,” also an SRD Implementing Code and Standard for these Safety Criteria, are used for design of nuclear filter train housings. “ASME AG-1-1997 with ASME AG-1a 2000 Addenda” includes construction and testing of filter housings and, under this proposed change, will be invoked for HVAC filters and associated SSCs to replace ASME AG-1-1997. ASME N509-89 will remain in the SRD as it has application beyond the design, construction and testing of nuclear facility filter housings.

¹ BNI letter from R. F. Naventi to R. J. Schepens, ORP, "For Approval: Authorization Basis Change Notice 24590-WTP-ABCN-ESH-02-028, Revision 0, Change “Implementing Codes and Standards” from ASME AG-1-1997 to ASME AG-1-1997 with ASME AG-1A 2000 Addenda, CCN 035828, dated December 4, 2002.

3.0 EVALUATION

Proposed change to SRD Implementing Codes and Standards for Safety Criterion 4.4-6, 4.4-7, 4.4-8, 5.3-4 and 5.3-5: Replace the current reference to “ASME AG-1-1997” with “ASME AG-1-1997 with ASME AG-1a 2000 Addenda.”

Evaluation (Acceptable): The proposed change is acceptable because it does not adversely affect the release of radiological or chemical materials. It also does not affect any surveillance or maintenance requirements for the filter housings and is administrative in that it consolidates all filter housing construction and testing requirements into one code.

4.0 CONCLUSION

On the basis of the considerations described above, ORP has concluded there is reasonable assurance that the health and safety of the public, the workers, and the environment will not be adversely affected by the proposed changes that are approved. The proposed changes that are approved to the SRD do not constitute a reduction in commitment or effectiveness. Accordingly, the proposed changes in the area of authorization basis maintenance are acceptable.